

**LOU ANDERSEN FARMS  
P.O. Box 141  
Fairfield, ID 83327  
(208) 764-2245**

May 18, 2005

National Organic Standards Board  
c/o Arthur Neal  
Room 4008 - South Building  
1400 and Independence Avenue SW  
Washington, DC 20250-0001

Dear Mr. Neal:

I am writing in response to the NOSB "Guidance for Interpretation of section 205.239(a) (2) of the National Organic Program, published for public comment on March 22.

I am against certain portions of the language of Sections (A) and (C), and I am in favor of the language in Section (B).

I am concerned about the negative financial implications that the restrictions of Sections (A) and (C) would have on me and many other organic farms in my area. My ability to produce and sell high quality organic dairy feed has enabled my farm to continue to exist. The loss of these markets would jeopardize my farms existence.

I am against two parts of the wording in Section A. First the specific requirement of 30% dry matter intake on a daily basis during the growing season but not less than 120 days. I grow 6,000 acres of mostly dryland organic hay and barley, which I supply to five organic dairies - I use production methods and cultural practices that are quite different from other farmers in this general area that are presented with different production challenges. I would not want other organic farmers to dictate an arbitrary farm management strategy or plan for my farming operation and I would not want to do the same to anyone else. There are many different climates and conditions in our diverse

country and I feel that all farmers should have the freedom to adopt a farm management strategy that will both uphold organic standards and work well for that specific area. The wording in Section (A) may work well in certain areas of the country, but would be impossible to implement in others. I would not want to be put in peril of losing my ability to farm profitably, nor would I want to put anyone else in another part of the country in a similar situation because of a regulation that only worked for me or someone else.

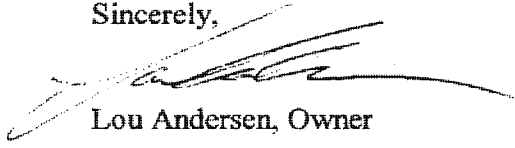
Secondly, I disagree with the five reporting requirements of Section (A). There are already enough means for verification of farm management in the current organic farm plan. I do not feel these requirements would be beneficial to anyone. They appear to be both unworkable and immeasurable. We already have a farm plan filled with time consuming reporting.

In Section (C) I disagree with using NRCS to regulate dairy animal grazing. I do not feel that NRCS is a good way to manage dairy pasture. In my area NRCS is already overburdened and has more expertise in beef cow pasture usage than dairy.

I feel that Section (B) is ok since all animals should be outside as much as possible and should have access to pasture as it applies to each area of the country.

I would appreciate your consideration of the above comments.

Sincerely,



Lou Andersen, Owner